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REMARKS

Claims 1-10 and 12-23 are pending in the application. Claims 6-10, 12 and 18-21 were allowed. Claims 1, 5, 13-17, 22 and 23 were rejected. Claims 1, 13 and 22 are currently amended. Reconsideration is respectfully requested.

Claims 1 and 13 distinguishes the combination of Chen and Hayama because an application is loaded on one network device which translates non-command line commands to command line commands for another network device. The Office suggests that Chen teaches reception of a command on behalf of another device. Applicant disagrees for the reasons already discussed in the previous Amendment. However, assuming *arguendo* that Chen teaches reception of a command on behalf of another device, the cited combination still fails to teach translating non-command line commands to command line commands for another network device. Such translation of commands enables some legacy devices which accept only command-line commands to utilize higher level applications, such as object oriented applications. One practical result is that the useful life of such legacy equipment may be extended, thereby saving in capital expenditure. Withdrawal of the rejections of claims 1 and 13 is therefore requested. Claims 2-5, 14-17, 22, and 23 are dependent claims which further distinguish the invention and are allowable for the same reasons stated above with regard to their respective base claims. Withdrawal of the rejections of claims 2-5, 14-17, 22, and 23 is therefore also requested.

Claims 2-4 and 17 were also rejected under 35 U.S.C. §103(a) over Chen in view of Hayama in further view of Blumenau. The Office cites Blumenau as teaching an interface compatible with Java, which is an object oriented programming language. Applicant does not assert to have invented the object-oriented interface. Rather, it is translation of non-command line commands to command line commands for another network device which, among other things,

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distinguish claims 2-4 and 17 from the cited combination. Withdrawal of the rejections of claims 2-4 and 17 over Chen in view of Hayama in further view of Blumenau is therefore requested.

Applicants further respectfully submit that a sufficient motivation to combine the cited references has not been shown. A *prima facie* case of obviousness under 35 U.S.C. 103 must include a showing of a suggestion, teaching or motivation that would have led a person of ordinary skill in the art to combine the cited references *in the particular manner claimed*. See *In re Dembiczak*, 175 F.3d 994, 998 (Fed. Cir. 1999), and *In re Kotzab*, 217 F.3d 1365, 1371 (Fed. Cir. 2000). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on Applicant's disclosure. *In re Vaech*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). In this case, the Office has not established that a person of ordinary skill in the art would be motivated to combine the cited combinations of references in the particular manner of the corresponding rejected claims.

Claims 22-23 were rejected under 35 U.S.C. §112 as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. More particularly, the Office objected to a lack of antecedent basis for the term "CLI-API" in claim 22, and objected to claim 23 for being dependent upon claim 22. Claim 22 has been amended by expanding the acronym CLI-API and replacing "the" with "a." Withdrawal of the rejections of claims 22 and 23 based on §112 is therefore requested.

Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone the undersigned, Applicants' Attorney at 978-264-4001 so that such issues may be resolved as expeditiously as possible.

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For these reasons, and in view of the above amendments, this application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,

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Date

  
Holmes Anderson, Reg. No. 37,272  
Attorney/Agent for Applicant(s)  
Steubing McGuinness & Manaras LLP  
125 Nagog Park  
Acton, MA 01720  
(978) 264-6664

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